

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

M.A., an individual)	
)	
Plaintiff,)	Case No: 2:19-cv-00849
)	
v.)	JUDGE ALGENON MARBLEY
)	
Wyndam Hotels and Resorts, Inc., et al.)	MAGISTRATE ELIZABETH
)	PRESTON DEAVERS
Defendants.)	

JOINT MOTION TO DISMISS WITHOUT PREJUDICE

Pursuant to Fed.R.Civ.P. 41(a), Plaintiff M.A., an individual (“Plaintiff”) and Defendant TJM Columbus, LLC d/b/a Crowne Plaza Columbus North-Worthington (“TJM”) (collectively the “Parties”) jointly move to dismiss any and all of Plaintiff’s claims against TJM without prejudice. In accordance with S.D. Ohio Civ. R. 7.3, Plaintiff and TJM have consulted and this motion is unopposed by the Parties.

In her Complaint, Plaintiff alleges that she was a victim of certain sex trafficking events that occurred at the Crown Plaza Columbus North - Worthington hotel (the “Hotel”) from the spring of 2014 to August 2015. However, TJM has provided information that it did not own, supervise, or operate the Hotel during this time period. Accordingly, the Parties jointly request to dismiss any and all claims against TJM without prejudice.

Plaintiff reserves its right to seek leave to amend her complaint to bring claims against TJM only if new information that is currently unknown to Plaintiff is discovered and suggests TJM is liable to Plaintiff by contractual obligation or otherwise. TJM does not anticipate such a circumstance, and would oppose any such amendment in the future.

Respectfully Submitted,

/s/ Greg Zarzaur

Gregory M. Zarzaur, Esq.
Anil A. Mujumdar, Esq.
Zarzaur
2332 Second Avenue North
Birmingham, AL 35203
gregory@zarzaur.com
anil@zarzaur.com

Of Counsel for Plaintiff M.A.

Respectfully Submitted,

/s/ John Stock

John F. Stock (#0004921)
Thomas B. Kern (#0084024)
41 South High Street, Suite 2600
Columbus, Ohio 43215-3506
Telephone: (614) 223-9300
Facsimile: (614) 223-9330
Email: jstock@beneschlaw.com
tkern@beneschlaw.com

*Attorneys for Defendant,
TJM Columbus, LLC d/b/a Crowne Plaza
Columbus North-Worthington, an IHG Hotel*

CERTIFICATE OF SERVICE

I hereby certify that on August 13, 2019, a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent by operation of the Court's case management and electronic filing system. Parties may access this filing through the Court's case management and electronic filing system.

/s/ John Stock

John F. Stock (#0004921)

Thomas B. Kern (#0084024)

41 South High Street, Suite 2600

Columbus, Ohio 43215-3506

Telephone: (614) 223-9300

Facsimile: (614) 223-9330

Email: jstock@beneschlaw.com

tkern@beneschlaw.com

Attorneys for Defendant,

TJM Columbus, LLC d/b/a Crowne Plaza Columbus

North-Worthington, an IHG Hotel